

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

Plaintiffs,

v.

**ASUSTEK COMPUTER INC.,
ASUS COMPUTER INTERNATIONAL,**

Defendants.

Case No.: 15-1125-GMS

JURY TRIAL DEMANDED

MICROSOFT CORPORATION,

Intervenor-Plaintiff,

v.

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

Intervenor-Defendants.

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

**Intervenor-
Defendants/Counterclaim
Plaintiffs in Intervention**

v.

MICROSOFT CORPORATION

**Intervenor-
Plaintiff/Counterclaim
Defendant in
Intervention**

AND

MICROSOFT MOBILE INC.

**Counterclaim Defendant
in Intervention**

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

Plaintiffs,

v.

VISUAL LAND, INC.

Defendant.

Case No.: 15-1127-GMS

JURY TRIAL DEMANDED

MICROSOFT CORPORATION,

Intervenor-Plaintiff,

v.

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

Intervenor-Defendants.

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

**Intervenor-
Defendants/Counterclaim
Plaintiffs in Intervention**

v.

MICROSOFT CORPORATION

**Intervenor-
Plaintiff/Counterclaim
Defendant in
Intervention**

AND

MICROSOFT MOBILE INC.

**Counterclaim Defendant
in Intervention**

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

Plaintiffs,

v.

**DOUBLE POWER TECHNOLOGY, INC.,
ZOWEE MARKETING CO., LTD.,
SHENZEN ZOWEE TECHNOLOGY CO.,
LTD.**

Defendants.

Case No.: 15-1130-GMS

JURY TRIAL DEMANDED

MICROSOFT CORPORATION,

Intervenor-Plaintiff,

v.

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

Intervenor-Defendants.

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

**Intervenor-
Defendants/Counterclaim
Plaintiffs in Intervention**

v.

MICROSOFT CORPORATION

**Intervenor-
Plaintiff/Counterclaim
Defendant in
Intervention**

AND

MICROSOFT MOBILE INC.

**Counterclaim Defendant
in Intervention**

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

Plaintiffs,

v.

YIFANG USA, INC. D/B/A E-FUN, INC.,

Defendant.

Case No.: 15-1131-GMS

JURY TRIAL DEMANDED

MICROSOFT CORPORATION,

Intervenor-Plaintiff,

v.

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

Intervenor-Defendants.

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

**Intervenor-
Defendants/Counterclaim
Plaintiffs in Intervention**

v.

MICROSOFT CORPORATION

**Intervenor-
Plaintiff/Counterclaim
Defendant in
Intervention**

AND

MICROSOFT MOBILE INC.

**Counterclaim Defendant
in Intervention**

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

Plaintiffs,

v.

**ACER INC.,
ACER AMERICA CORPORATION,**

Defendants.

MICROSOFT CORPORATION,

Intervenor-Plaintiff,

Case No.: 15-1170-GMS

JURY TRIAL DEMANDED

v.

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

Intervenor-Defendants.

**KONINKLIJKE PHILIPS N.V.,
U.S. PHILIPS CORPORATION,**

**Intervenor-
Defendants/Counterclaim
Plaintiffs in Intervention**

v.

MICROSOFT CORPORATION

**Intervenor-
Plaintiff/Counterclaim
Defendant in
Intervention**

AND

MICROSOFT MOBILE INC.

**Counterclaim Defendant
in Intervention**

**PLAINTIFFS' OPPOSITION TO INTERVENOR MICROSOFT'S RENEWED
MOTION TO TRANSFER CLAIMS UNDER 28 U.S.C. § 1404(a)**

In response to Intervenor Microsoft's Renewed Motion to Transfer Claims under 28 U.S.C. § 1404(a) (*see* D.I. 261 in C.A. No. 15-1125), Plaintiffs Koninklijke Philips N.V. and U.S. Philips Corporation (collectively, "Philips") hereby incorporate by reference: (1) their Answering Brief in Opposition To Intervenor Microsoft's Motion to Transfer Claims Under 28 U.S.C. § 1404(a) (*see* D.I. 193 in C.A. No. 15-1125), and (2) their Answering Brief in

Opposition to Defendants' Renewed Joint Motion to Transfer in C.A. Nos. 15-1125, 15-1126, 15-1131, and 15-1170, which is being filed today. For the reasons explained therein, Philips respectfully requests that the Court exercise its inherent power and discretion to find that all Microsoft Customer Defendants (ASUS, Acer, Visual Land, YiFang, and Double Power) forfeited their venue defense, and deny Microsoft's motion to transfer the claims and counterclaims by and against Microsoft in C.A. Nos. 15-1125, 1127, 1130, 1131, and 1170 to the Northern District of California.

Dated: December 6, 2017

MCCARTER & ENGLISH, LLP

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